

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

ERIC COOPER, as the Personal	)	
Representative of the Estate of Michael	)	
Dudley Cooper, Deceased,	)	
	)	
Plaintiff,	)	Case No. CIV-18-1060-HE
	)	
v.	)	
	)	
(1) KESTO SIMPSON, individually;	)	
	)	
(2) THE CITY OF WALTERS,	)	
a municipal corporation;	)	
	)	
(3) KENT SIMPSON, individually and in	)	
his official capacity; and	)	
	)	
(4) JOHN DOES 1-10, individually,	)	
	)	
	)	
Defendants.	)	

## APPLICATION FOR AGREED PROTECTIVE ORDER

**COME NOW** the parties and, respectfully, move this Court to enter the Agreed Protective Order submitted herewith. In support of this Application, the parties show the Court as follows:

1. The parties have been and are currently engaged in written discovery and document production.
2. Certain documents and information have been requested in this case which the parties believe to be confidential.

3. The parties have agreed to protect against the disclosure of certain information to certain persons outside of this case through the proposed Agreed Protective Order.

**WHEREFORE**, all premises considered, the parties respectfully request this Court's approval of the Agreed Protective Order, which will be submitted for the Court's consideration via e-mail.

Respectfully submitted,

/s/ Barrett T. Bowers

Stanley M. Ward, OBA#9351  
Woodrow K. Glass, OBA#15690  
Barrett T. Bowers, OBA#30493  
For the Firm: Ward & Glass, L.L.P.  
1601 N.W. 36th Avenue, Suite 100  
Norman, Oklahoma 73072  
[rstermer@wardglasslaw.com](mailto:rstermer@wardglasslaw.com)  
[woody@wardglasslaw.com](mailto:woody@wardglasslaw.com)  
[barrett@wardglasslaw.com](mailto:barrett@wardglasslaw.com)  
405-360-9700  
405-360-7902 (fax)

-and-

Bret Burns  
Burns Law Office  
519 W. Chickasha Avenue  
Chickasha, OK 73018  
**ATTORNEYS FOR PLAINTIFF**

-and-

Renee Walker Gunkel, OBA#12314  
Preston M. Gunkel, OBA#33185  
Gunkel Law Group, PLLC  
P.O. Box 1124  
Altus, OK 73522  
(580) 482-8204 – T

[renee@gunkellawgroup.com](mailto:renee@gunkellawgroup.com)  
[preston@gunkellawgroup.com](mailto:preston@gunkellawgroup.com)

**CERTIFICATE OF SERVICE**

I certify that the above and foregoing was transmitted to all counsel of record through the Court's ECF System.

/s/ Barrett T. Bowers  
Barrett T. Bowers